HERITAGE
THERMAL SERVICES

HERITAGE THERMAL SERVICES
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
www.heritage-thermal.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

February 5, 2016
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Erik Bewley
Environmental Specialist
Ohio EPA
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

RE: HERITAGE THERMAL SERVICES, INC.
FACILITY ID: 0215020233
RESPONSE TO NOV DATED 1/21/2016

Dear Mr. Bewley:

Heritage Thermal Services, Inc. (HTS) received a Notice of Violation (NOV) letter from your office dated January 21, 2016 that cites an exceedance of the facility's permitted short-term limit for emissions of nitrogen oxides (NOx) occurring on June 28, 2015 and requests that HTS respond within 14 days with a plan that will address how an exceedance of this type will be prevented in the future. This letter responds to your request for a plan of action.

On July 30, 2015, HTS self-reported the exceedance of the NOx emission limit of 28.36 pounds per hour in a required quarterly report for the second calendar quarter of 2015. HTS reported an hourly emission rate of 29.82 pounds per hour during the 3-hr block time period of 0601-0900.

NOx is a combustion by-product of nitrogen-bearing materials. An investigation into the cause of this exceedance revealed that a waste stream containing higher than expected nitrogen-bearing compounds was fed to the incinerator at a rate resulting in NOx emissions exceeding the short-term limit.

HTS has taken the following actions to address the issues raised by the June 2015 exceedance, in an effort to prevent future exceedances of this type:

- Following the June 28, 2015 exceedance, HTS began exploring tools that would enhance the incinerator control room operators' monitoring of NOx emissions in relation to the 3-hour block period and help them to evaluate the NOx emissions impact of future waste feeds. This investigation resulted in changes to the visual displays used by the control room operators. The monitoring screen located in the control room that shows NOx emission rates was adjusted to highlight the relationship between current NOx emissions and the 3-hour block average. Additionally, a second monitoring screen was updated to provide the operator with real-time emissions data for NOx. These visual changes should increase operator awareness of real-time emissions relative to the 3-hour block, which should allow time for the operators to act to try to prevent an exceedance.

- Following the changes noted above, training was provided to the control room staff on the utilization of the new visual aids and on the operator's responsibility to maintain the emission limits. This training has been documented and records of this will be maintained within the facility's training files.

- In addition, in 2015, HTS invested in a laboratory instrument that aids in determining the nitrogen content of bulk waste streams received at the facility. HTS is utilizing the instrument to quantify nitrogen content in high-BTU fuel waste streams received at the facility which often contain nitrogen compounds that lead to NOx formation during the combustion process. The data generated by the instrument is uploaded to plant information systems and utilized by management and the operations staff to predict emission impacts when generating incinerator burn plans and maintaining operating conditions. With the expanded real-time NOx emissions information discussed above, operators can now advise expanded use of the laboratory instrument, as necessary, when NOx levels indicate more scrutiny of incoming waste is needed.

HTS believes these actions will help to prevent exceedances of the type experienced on June 28, 2015. If you have further questions, please do not hesitate to me at 330-386-2196.

Sincerely,

Carrie L Beringer

Carrie L. Beringer
Environmental, Health, and Safety Manager
Heritage Thermal Services, Inc.

Cc: John Paquelet, Ohio EPA, DMWM, NEDO
Paul Dolensky, Ohio EPA, DMWM, NEDO
Ed Fasco, Ohio EPA, DAPC, NEDO
Tim Fischer, Ohio EPA, DAPC, NEDO
Natalie Oryshkewych, Ohio EPA, DMWM, NEDO